

United States District Court, Northern District of Illinois

Name of Assigned Judge or Magistrate Judge	Amy J. St. Eve	Sitting Judge if Other than Assigned Judge	
CASE NUMBER	05 CR 727 - 1,2,3,5	DATE	3/16/2007
CASE TITLE	USA vs. Conrad Black, John Boulton, Peter Atkinson and Mark Kipnis		

DOCKET ENTRY TEXT

Juror Questionnaire filed.

■ [For further details see text below.]

Notices mailed by Judge's staff.

STATEMENT

NAME: _____

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA**v.****CONRAD M. BLACK, et al.**

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No. 05 CR 727**Hon. Amy J. St. Eve****JUROR QUESTIONNAIRE**

You have been summoned by this Court for jury selection. The case for which you have been summoned for jury selection is a criminal case entitled *United States of America v. Conrad M. Black, John A. Boulton, Peter Y. Atkinson, Mark S. Kipnis, and The Ravelston Corporation Limited* ("Ravelston"). In the indictment, defendants Black, Boulton, Atkinson, Kipnis, and Ravelston are charged with various alleged offenses related to the conduct of the affairs of Hollinger International, Inc. Each of the defendants has pled not guilty to the charges alleged.

As part of the jury selection process, each of you must complete this juror questionnaire. The questions on this form are asked to assist the Court and the attorneys in the jury selection process for this trial. This questionnaire is designed to obtain information about your background as it relates to your possible service as a fair and impartial juror in this case. Its use will avoid the necessity of asking each prospective juror every one

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of these questions in open Court, thereby substantially shortening the jury selection process. Unless the question states otherwise, the fact that a particular question is asked does not imply that the subject matter of the question is an issue in this case. As you read the questions, you are not to draw any inferences about the issues which must be decided in this case.

The questions are not meant to invade your privacy, but to help select a fair and impartial jury for this case. If there is any reason why you might not be able to give both sides a fair trial in this case, it is important to say so. Please answer each question as fully as you can. Your complete honesty is essential. Do not leave any questions blank. If a question does not apply to you in any way, write "N/A" (for "not applicable"), rather than leaving the form blank. If you do not understand the question, please write that in the space for the answer. If you feel the answer is too personal, please say so in the space provided. You will have the opportunity to discuss your answer privately. If you do not understand a question, need more space for your response, or wish to make further comments about any question, please use the extra sheet attached to the back of the questionnaire. If you use the explanation sheets, please make sure to indicate which numbered question you are answering. **DO NOT WRITE ON THE BACK ON ANY PAGE.**

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You are instructed not to discuss this case or questionnaire with anyone, including your family or fellow jurors. It is important that your answers be yours and yours alone.

Your answers are confidential. They will be reviewed by the judge and the lawyers in this case. Following jury selection, the original questionnaire will be kept under seal and will be disclosed, if at all, with names and other identifying information removed. There may be some questions that touch on matters that you consider personal, private or otherwise sensitive. In order to select a fair and impartial jury, however, it is important that the Court and the lawyers have your complete and truthful answers to these kinds of questions. If there are certain questions you prefer not to answer in writing (even though the document remains confidential), please so indicate and the judge will discuss it with you in private at a later time.

Please print your name on the cover page, and upon completion, sign your name on the last page where indicated. If possible print your answers and use ink only. You are expected to sign your questionnaire, and your answers will be given the same effect as a statement given to the Court under oath.

An indictment is merely an accusation. It is proof of nothing. You may draw no inference against any defendant from the fact that he has been indicted. Each defendant has pleaded "not guilty" to each of the charges against him/it and he/it is presumed innocent. A defendant does not have to prove anything. The government bears the burden of proving the guilt of each defendant beyond a reasonable doubt.

Judge Amy St. Eve is the trial judge in this case. Once the jury is selected, generally this case will be tried from approximately 9:30 a.m. to 5:00 p.m., Monday through Thursday each week. You typically will have Fridays off from court. If you are expected to be here on a Friday, Judge St. Eve will let you know in advance. The next phase of the jury selection process will begin on March 14, 2007 at 9:00 a.m., and will continue until completed. During this phase, you will likely be asked follow-up questions by the judge based on your responses to this questionnaire. You will have the opportunity to answer any of these questions in private. To determine whether you will be required to report on Wednesday, March 14, or one day shortly thereafter, you must call 1-800-572-4210 and key in your participant number when indicated (your participant number is located to the right of your name on the summons.) The message will inform you which day and time to appear. The opening statements and presentation of the evidence in the trial will begin after the jury selection process is completed. The trial is expected to last 12 to 16 weeks from the commencement of opening statements. This is just an estimate and the time frame could change a bit depending on the circumstances of the case.

Thank you for your time and cooperation.

1. Name : _____
(First) (Middle Initial) (Last) (Maiden, if applicable)

Sex:

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3. Date of Birth: _____ Age: _____

4. Where were you born and raised? _____

5. What city/town/village and county do you currently live in?

(city/town)

(zip code)

(county)

6. If you live in the Chicago area, what is the name of your neighborhood, if any (for example, Streeterville, Jefferson Park, etc.)? _____

7. Are you currently: (check all that apply)

Married __ (Since _____) Divorced __ (Since _____)

Separated _ (Since _____) Widowed __ (Since _____)

Single, Never Married __

Living With a Partner/Significant Other _ (Since _____)

8. Do you have any medical issues, mental impairments or physical problems (for example, sight, hearing, or back) that may affect your ability to understand the evidence or would make it difficult for you to sit for long periods?

☐ Yes ☐ No

If yes, please describe:

9. If you have children or stepchildren, please list for each child (include children and stepchildren who do not live with you), his or her sex, age, where they reside, education level, and (if applicable) occupation.

Sex

Age

City of Residence

Education Level

Occupation and Employer (or if in college, their school attended and degree sought)

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Please provide the following information about your parents (and your stepparents, if any):

City of Residence R e t i r e d ?
Occupation/Employment? (before retirement or death, if applicable)

Father

Mother

Stepfather

Stepmother

(a) How long have you lived at your current address? ____ years

(b) Which of the following best describes your type of residence?

_____ Rental apartment	_____ Own home
_____ Rental house	_____ Own apartment/condo/townhome
_____ Rental (other)	_____ Own mobile home
_____ Other (specify) _____	

In what other cities, towns, or areas have you lived during the past 10 years, and how long did you live there? (Please note if you have lived in another country or state.)

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13. If you live with persons other than your spouse/partner and/or children/stepchildren, please explain their relationship to you (for example, roommate or parent) and their occupation:
14. What is the name of your current employer, your job title and job description? (Or, if you are no longer employed, list your last employer, job title and job description.)
- (a) How many years have you worked at your current/last job? _____ Years
- (b) Regarding your employment, please check all that apply to you at this time:
- | | |
|--------------------|-------------------------------------|
| _____ Part-time | _____ Unemployed |
| _____ Full-time | _____ Self-employed |
| _____ Work at home | _____ Family Farm |
| _____ Homemaker | _____ Own Business |
| _____ Retired | _____ Disabled |
| _____ Student | _____ Other (please describe) _____ |
- (c) Please briefly describe what you do on the job on a typical work day:
- (d) Do/did you have management or supervisory duties? ☐ Yes ☐ No
- (e) Are you/were you supervised by others at your job? ☐ Yes ☐ No
- (f) Do/did you have authority to hire and fire employees? ☐ Yes ☐ No
- (g) Will you be paid by your employer during jury service? ☐ Yes ☐ No

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If yes, for how many days? ____

15. Please list prior occupations and employers, if any during the last ten years:

Job	Employer	How long employed there?
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16. Have you or anyone close to you ever worked for any of the following?

_____ State, City or County office/dept./agency	_____ Police department
_____ Illinois Department of Corrections	_____ Law firm
_____ Federal government office/dept./agency	_____ State or Federal court
_____ Other government agency/office	_____ Other Law Enforcement

If you checked any of the above, please describe the person involved, the agency or organization involved and the nature of the employment:

17. Have you or anyone close to you ever owned a business?

☐ Yes ☐ No

(a) If Yes, briefly describe the type and size of the business:

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(b) If Yes, was the business ever bought or sold by you or anyone close to you ?

☐ Yes ☐ No

If Yes, briefly describe:

18. Have you or anyone close to you ever had any training, education, or been employed in the newspaper industry?

☐ Yes ☐ No

If yes, please explain:

19. Have you or anyone close to you ever been employed in or had any training or education in any aspect of the legal field?

☐ Yes ☐ No

If yes, please explain:

(a) Have you ever hired or consulted with a lawyer for any reason?

☐ Yes ☐ No

If yes, please describe:

(b) If yes, were you satisfied with your representation?

☐ Yes ☐ No

If your answer is yes OR no, please describe:

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(c) Do you have business dealings with attorneys in the normal course of your work?

☐ Yes ☐ No

If yes, please describe:

(d) How many attorneys have you known fairly well? _____

(e) Are you or anyone close to you now employed, or ever been employed, by a law firm or office?

☐ Yes ☐ No

If Yes, please list each employer and briefly describe the nature of your employment:

20. Have you or anyone close to you ever been employed in the accounting profession?

☐ Yes ☐ No

If yes, please describe:

(a) How many accountants or auditors have you known fairly well? _____

(b) Do you have business dealings with accountants or auditors in the normal course of your work?

☐ Yes ☐ No

If yes, please describe:

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21. What is your highest education level?

- ☐ Grammar school ☐ Some high school ☐ High school diploma/GED
☐ Trade or technical school
☐ Subject studied and degree: _____

Some college	Major/Degree: _____	School attended _____
College degree	Major/Degree: _____	School attended _____
Graduate school	Major/Degree: _____	School attended _____

22. Do you have any plans to attend school in the future? ☐ Yes ☐ No If Yes, please explain:

23. Describe any special training or skills that you have (for example as a welder, auto mechanic, or cook):

24. Have you or any immediate members of your family ever served in any branch of the armed forces of the United States (including military reserve or ROTC)?

☐ Yes ☐ No

If Yes, please answer the following and identify if the person is you or a member of your family:

- (a) What branch of service:
- (b) When did you or your relative serve:
- (c) Highest rank achieved:
- (d) Occupational specialty:

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- (e) Duties:
- (f) Place of service:
- (g) Did you or this person see combat?
- (h) Have you or any of your family members participated in a Court Martial?
☐ Yes ☐ No
- (i) If Yes, when, where and under what circumstances:
- (j) What type of discharge did you or that person receive?

25. Have you or anyone close to you received training, education or had work experience in any of the following fields:

- | | |
|---|--|
| _____ Accounting/auditing | _____ Banking |
| _____ Bookkeeping | _____ Business |
| _____ Finance | _____ Law enforcement |
| _____ Prisons/correctional facilities | _____ Stock Brokerage |
| _____ Shareholders' Rights | _____ Real Estate (including appraisals) |
| _____ Newspaper/Television or other media | |

If you checked any of the choices above, please explain in detail:

26. What are your primary leisure activities, hobbies and interests?

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27. What charitable, civic, social, union, professional, fraternal, political, recreational or religious organizations do you and/or your significant other volunteer for; belong to; participate in; donate money, time or services to; or hold offices in?
28. Spouse or Significant Other -- Please complete the following questions regarding your spouse/ significant other. (If you are (Please check): _____ Widowed _____ Divorced or _____ Separated and currently not married, please complete the following questions regarding your former spouse.)
- (a) Spouse's/significant other's age: _____
- (b) What is the highest level of education your spouse or significant other completed?
- | | |
|------------------------------------|------------------------------------|
| ___ Grade school or less | _____ Less than 2 years of college |
| ___ Some high school | _____ More than 2 years of college |
| ___ High school graduate | _____ College graduate |
| _____ Technical or business school | _____ Post graduate degree |
- (c) Spouse's/significant other's current employment status or former employment status (if deceased):
- | |
|--------------------------|
| _____ Employed full-time |
| _____ Employed part-time |
| _____ Homemaker |
| _____ Student |

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_____	Unemployed - looking for work
_____	Unemployed - not looking for work
_____	Retired

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- (d) What is her/his occupation (Note - If your spouse or significant other is retired, unemployed or deceased, please answer the following questions as regards his/her last employment).
- (e) Who is his her employer (or is he or she self-employed)?
- (f) How long has or did she/he worked there?
- (g) Please describe her/his job:
- (h) Does he or she supervise any other employees? If Yes, please explain:
- (i) Please list any other jobs she/he has had as an adult for the last 5 years. If your spouse/significant other is retired or deceased, please list the jobs she/he held for the last 10 years before retirement or death.

Job title Employer How long employed there?

29. Have you or anyone close to you ever been employed by Hollinger International, Inc., or any of its subsidiaries, affiliates or partnerships, including the *Chicago Sun Times*?

☐ Yes ☐ No

If yes, please explain:

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30. Do you follow the news on a regular basis? ☐ Yes ☐ No

(a) If yes, check all the news you follow on a regular basis.

<input type="checkbox"/> World news	<input type="checkbox"/> Domestic (US) news
<input type="checkbox"/> Local news	<input type="checkbox"/> Business/financial news
<input type="checkbox"/> Sports news	<input type="checkbox"/> Entertainment news
<input type="checkbox"/> Other news (specify _____)	

(b) What is the most important source of news for you? (Check only one)

<input type="checkbox"/> Newspapers	<input type="checkbox"/> TV
<input type="checkbox"/> Radio	<input type="checkbox"/> Magazines
<input type="checkbox"/> Friends and family	<input type="checkbox"/> Internet

(c) Which newspapers do you read regularly, including both local and out-of-town papers?

(d) How often do you read a newspaper?

<input type="checkbox"/> Every day	<input type="checkbox"/> Several times a week
<input type="checkbox"/> Once or twice a week	<input type="checkbox"/> Less often than once a week
<input type="checkbox"/> Never	

(e) Which television programs do you watch on a regular basis?

(f) Do you watch financial news programs or networks (for example, CNBC and Bloomberg) or visit financial news websites (for example, Yahoo! Finance, Money.com, CNN-FN, CFO.com) or read the financial/business news (for example, the business pages of your local newspaper) on a regular basis?

☐ Yes ☐ No

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(g) Which magazines do you read regularly?

(h) Which radio programs do you listen to on a regular basis?

31. Are you a regular user of the internet? ☐ Yes ☐ No

(a) If yes, what do you use the internet for?

(b) If you get news from the internet, what websites do you frequently visit?

32. If you are selected as a juror in this case, the Court will instruct you not to read, listen to or watch any news media accounts of the trial, including those on the internet.

(a) Will you have any difficulties following this instruction?

(b) This case may receive media attention during trial. Does this matter in any way to you? ☐ Yes
☐ No

If Yes, please explain:

33. Have you or anyone close to you ever:

(a) Been arrested, charged with or convicted of a crime? ☐ Yes ☐ No

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- (b) Appeared as a witness before any federal, state or district court, grand jury or government body or agency (including any legislative committee)? ☐ Yes ☐ No
- (c) Sued or been sued by anyone? ☐ Yes ☐ No
- (d) If you checked Yes for any of the above, please explain here.

34. Was there any sort of court hearing in the matters you described in the preceding question? ☐ Yes ☐ No

If Yes, did you or the person close to you, testify at that court hearing? ☐ Yes ☐ No

- (a) If Yes, who testified?
- (b) If Yes, how did you or the person close to you, feel about the experience?

35. Have you or anyone close to you ever been asked to testify in court as an expert witness, or as a witness with special knowledge or training?

☐ Yes ☐ No

If yes, please describe:

36. Have you or anyone close to you been the victim of, or witness to, any kind of crime, whether it was

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reported to law enforcement authorities or not?

☐ Yes ☐ No

(a) If yes, was anyone caught? What was the outcome of the case?

(b) Have you or anyone close to you ever been the victim of fraud or another type of financial crime?

☐ Yes ☐ No

If yes, please give details:

37. Have you or anyone close to you made or brought any claims or lawsuits against any federal, state, district or local government agency or have any claims or lawsuits ever been made by any federal, state, district, local official or government agency against you or anyone close to you?

☐ Yes ☐ No

If Yes, please explain:

38. Are you or anyone close to you employed by a law enforcement agency (as an employee or a volunteer)?

☐ Yes ☐ No

If yes, please describe:

(a) Have you or anyone close to you ever applied or considered applying to any law enforcement agency, or had any training, courses, or work experience in law enforcement, criminal justice, administration of justice,?

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☐ Yes ☐ No

If yes, please explain:

- (b) Have you or anyone close to you ever worked for, applied to or had any experience with the Federal Bureau of Investigation, the Internal Revenue Service, the United States Postal Service, the United States Attorneys Office or the United States Securities and Exchange Commission?

☐ Yes ☐ No

If yes, please explain:

39. Do you feel that you might give more or less weight to the testimony of agents of the federal government than to civilian witnesses?

☐ Yes ☐ No

Please explain why or why not:

40. Do you currently, or have you ever, owned stocks (including mutual funds)?

☐ Yes ☐ No

- (a) If Yes, have you owned or are you aware of whether your mutual fund owned stock in Hollinger Inc. or Hollinger International, Inc. (which owned the *Chicago Sun Times*) at any time in the past ten years? ☐ Yes ☐ No

- (b) If Yes, could you impartially consider evidence presented about Hollinger Inc., Hollinger

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International, Inc. and its directors, officers and other present and former employees? ☐ Yes
☐ No

If No, please explain:

41. Have you or anyone close to you ever participated in any group concerned with crime prevention or victims' rights?

☐ Yes ☐ No

If yes, please list the organization, who participated, and any position that person holds or held:

42. Have you ever served as a juror before?

☐ Yes ☐ No

If yes, please complete for each case on which you served:

Civil or Criminal?

What were the charges or allegations?

When and where was the trial?

Did the jury reach a verdict? (Yes or No)

(a) If you have served on a jury before, were you the foreperson?

☐ Yes ☐ No

(b) Have you ever served on a grand jury or coroner's jury?

☐ Yes ☐ No

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If yes: When: _____

Where: _____

Kind of jury: _____

(c) How did you feel about your service as a juror?

43. Was there anything about your experience as a juror which would make you want to serve again or not want to serve again? ☐ Yes ☐ No

If Yes, please explain.

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THIS CASE

This case is about an alleged financial fraud at a company called Hollinger International, which was the parent company that owned the Chicago Sun Times. The defendants in this case are Conrad Black, John Boulton, Peter Atkinson, Mark Kipnis and The Ravelston Corporation Limited (“Ravelston”).

The defendants are presumed to be innocent of all charges. The defendants have pled not guilty to all charges.

The prosecution has the burden of proving each defendant guilty of each charge beyond a reasonable doubt.

44. Do you or any family members know Conrad Black, John Boulton, Peter Atkinson or Mark Kipnis? Have you heard of The Ravelston Corporation Limited?

45. From time to time, this case has received media attention. There is nothing wrong with having heard something about this case. It is important that you truthfully and fully answer the following questions concerning your knowledge about this case.

(a) Have you seen, read or heard anything about this case or the criminal charges being brought against any of the defendants in this case: Conrad Black, John Boulton, Peter Atkinson, Mark Kipnis, or Ravelston?

☐ Yes ☐ No

If Yes, please describe:

(b) In general, have you formed an opinion about this case?

☐ Yes ☐ No

If Yes, please describe:

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(c) If you have formed an opinion or impression about the case, will it take evidence from the defendants or the government to change that opinion or impression?

☐ Yes ☐ No

If Yes, please describe:

46. Conrad Black is a defendant in this case. How much, if anything, have you seen, read, or heard about Conrad Black?

☐ Nothing ☐ Some Things ☐ A lot

(a) What have you heard and what do you know about Conrad Black?

(b) What impressions, feelings, or opinions had you formed about Conrad Black before coming into Court today?

(c) Have you formed any opinions about the guilt or innocence of defendant Conrad Black?

If yes, please explain:

47. John Boulton is a defendant in this case. How much, if anything, have you seen, read, or heard about John Boulton?

☐ Nothing ☐ Some Things ☐ A lot

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- (a) What have you heard and what do you know about John Boulton?
- (b) What impressions, feelings, or opinions had you formed about John Boulton before coming into Court today?
- (c) Have you formed any opinions about the guilt or innocence of defendant John Boulton?

If yes, please explain:

48.

Peter Atkinson is a defendant in this case. How much, if anything, have you seen, read, or heard about Peter Atkinson?

☐ Nothing ☐ Some Things ☐ A lot

- (a) What have you heard and what do you know about Peter Atkinson?
- (b) What impressions, feelings, or opinions had you formed about Peter Atkinson before coming into Court today?

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(c) Have you formed any opinions about the guilt or innocence of defendant Peter Atkinson?

If yes, please explain:

49.

Mark Kipnis is a defendant in this case. How much, if anything, have you seen, read, or heard about Mark Kipnis?

☐ Nothing ☐ Some Things ☐ A lot

(a) What have you heard and what do you know about Mark Kipnis?

(b) What impressions, feelings, or opinions had you formed about Mark Kipnis before coming into Court today?

(c) Have you formed any opinions about the guilt or innocence of defendant Mark Kipnis?

If yes, please explain:

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50. Ravelston (a corporation) is a defendant in this case. How much, if anything, have you seen, read, or heard about Ravelston?

☐ Nothing ☐ Some Things ☐ A lot

(a) What have you heard and what do you know about Ravelston?

(b) What impressions, feelings, or opinions had you formed about Ravelston before coming into Court today?

(c) Have you formed any opinions about the guilt or innocence of defendant Ravelston?

If yes, please explain:

51. Is there anything that you have heard about this case that you feel would make it hard for you to be a fair and impartial juror in this case?

☐ Yes ☐ No

If yes, please describe:

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52. During this trial, you may hear testimony about the entities listed below.

American Publishing Company

American Publishing Management Services, Inc.

Bass, Berry & Sims PLC

CanWest Global Communications Corporation

Cardinal Capital Management, Inc.

Chicago Sun-Times

Community Newspaper Holdings, Inc.

Cravath, Swaine & Moore LLP

Davies, Ward, Phillips & Vineberg, LLP

Dirks Van Essen & Associates

Forum Communications Company

Groia & Company

Hollinger Canadian Newspapers,

Limited Partnership

Hollinger International Publishing, Inc.

Hollinger International, Inc.

Hollinger, Inc.

Horizon Publishing Inc.

Interec Publishing Corporation

Jerusalem Post

KPMG LLP

Morgan Stanley Dean Witter & Co.

National Post

Newspaper Holdings, Inc.

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____O'Melveny & Meyers LLP

Osler, Hoskins & Harcourt LLP

Osprey Media Group Inc.

Osprey Media Holdings Inc.

Paxton Media Group LLC

PMG Acquisition Corp.

Primedia Inc.

The Ravelston Corporation Ltd.

Ravelston Management Inc.

Richard C. Breeden & Co.

Shearman & Sterling

Southam, Inc.

Southam Business Communications, Inc.

Sugra Ltd.

The Telegraph Group

The Daily Telegraph

The Sunday Telegraph

Toronto-Dominion Bank

Torys LLP

Tweedy, Browne Company LLC

Vogel Law Firm

Wachovia Bank

Winston & Strawn LLP

XSTM Holdings (2000) Inc.

Do you or anyone close to you have any personal knowledge or experience with any of them?

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☐ Yes ☐ No

If Yes, please provide the following information:

Entity or event about which you have personal knowledge

What is the source of your knowledge?

What do you know about that entity or event?

53. A list of names of possible witnesses or persons whose names might be mentioned during this trial is listed below.

William Ainely
 Ralph Barford
 Lance Bloomfield
 Richard Breeden
 David Brooks
 Christopher Browne
 Richard Burt
 Lloyd Case
 Leslie Coolidge
 Lee Cooperman
 Frederick A. Creasey
 Monique Delorme
 Beth DeMerchant
 Mathew Doull
 Barry Epstein
 James Fabro
 Duncan Forsythe
 Eugene Fox, III
 Alan Funk
 Andrew Geist

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Rebecca Goldman
Steve Hall
Gabe Hayos
Paul B. Healy
Gulliaume Hecketsweiler
Thomas Henson
Roderick Hills
Craig Holick
Laura Jereski
Steven Johnson
Thomas L. Kabler
Ann Kippen
Henry A. Kissinger
Marie-Josee Kravis
Peter S. Laino
Jinyan Li
Linda Loye
Joan Maida
William Marcil
Ralph J. Martin
Roland McBride
Charles McCurdy
_____Jonathan Miller
Warren J.A. Mitchell
Lisa Morse
Kevin Murphy
Robert Musur
Alan Nadel
Ralph T. Neveille
Jennifer Owens
Christopher Paci
Gordon Paris
David Paxton
Gustavo Pedernera

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Richard Perle Pao Phua Kay Pishka David Power David Radler James F. Reda Michael Reed Ann Riposuanu William "Bud" Rogers Marc Rosenberg Jonathan Rosenberg Patrick Ryan Maureen J. Sabia Paul Saunders Shari Schindler Ken Serota Mahmood Shahab Robert Smith Ben Soave Marilyn Stitt Jerry Strader Brian Stevens Darren Sukonick James Thompson Barry Tyner Donald Vale Owen Van Essen Todd Vogt Angela Easterling Way James Winikates
--

Do you or anyone close to you personally know any of these persons?

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<input type="checkbox"/> Yes <input type="checkbox"/> No
--

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If Yes, please provide the following information:

Name of witness: How do you, your family member, or your friend know this witness?

How long have you, your family member, or your friend known this witness?

54. Some individuals you may hear from or about in this case have titles such as “Lord” or “Ambassador.”
Would the fact that an individual held such a title cause you to view them differently?

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55. The attorneys and law firms expected to be involved in this case are listed below. **Attorneys:**

Donald Corbett

Jeffrey Cramer

Zachary Fardon

Terence Gillespie

Edward Genson

Richard Greenberg

Edward Greenspan

Carolyn Gurland

Ian Hochman

Patricia Brown Holmes

Jane Kelly

Marc Martin

Royal Martin

Gus Newman

Benito Romano

Julie Ruder

Ronald Safer

Michael Schachter

Edward Siskel

Deborah Steiner

Eric Sussman

Michael Swartz

Robert Tarun

Patrick Tuite

Steven Yurowitz **Law firms:**

Arnstein & Lehr

Dickstein Shapiro

Genson & Gillespie

Greenspan & White

Latham & Watkins

Martin, Brown & Sullivan

Newman & Greenberg

Schiff Hardin

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Schulte Roth & Zabel Willkie Farr & Gallagher Do you know any of these attorneys or firms? <input type="checkbox"/> Yes <input type="checkbox"/> No

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If Yes, please provide the following information:

Name of attorney or firm you know:

How do you know this attorney or firm?

How long have you known this attorney or firm?

56. In general, what, if any, opinions do you have about people from Canada?

57. If you heard evidence that some of the defendants in this case received tens of millions of dollars, would that fact alone cause you to believe that there must have been some type of misconduct?

If yes, please explain.

58. Do you think there should be:

- ☐ More government regulation of large corporations
- ☐ Less government regulation of large corporations
- ☐ The amount of current regulation is adequate
- ☐ No opinion

STATEMENT

59. During the case, there will be evidence about law firms that have large corporations as clients. Do you hold any views about law firms that could affect your view of evidence in this case?

☐ Yes ☐ No

If yes, please describe:

60. During the case, there will be evidence about practices in which a person or corporation may set up a transaction to obtain better tax treatment. Do you hold any views about such practices that could affect your view of evidence in this case?

☐ Yes ☐ No

If yes, please describe:

61. During the case, there will be evidence about the practice of obtaining, in connection with a business transaction, so-called "non-competition agreements" (also sometimes called "covenants not to compete").

(a) Have you ever signed a non-competition agreement (or covenant not to compete) or been asked to sign one?

☐ Yes ☐ No

(b) Do you hold any views about such agreements that could affect your view of evidence in this case?

☐ Yes ☐ No

STATEMENT

If yes, please describe:

62. Have you ever had anyone lie to you or mislead you in a business dealing?

If yes, please describe:

63. Have you or anyone close to you ever served on a Board of Directors, or been an Officer of, any corporation, company, charitable organization or other entity?

☐ Yes ☐ No

If Yes, briefly describe your responsibilities and type/size of the organization:

64. Have you ever read a Shareholder Proxy Statement, Form 10-K, Form 10-Q or Annual Shareholder's Report of a publicly traded company or corporation?

☐ Yes ☐ No

If yes, please describe:

65. Have you ever lost a significant amount of money on an investment?

☐ Yes ☐ No

If yes, is there anything about that experience that would cause you to pre-judge the evidence in this case?

STATEMENT

66. Have you or anyone close to you been affected by financial problems at companies where there have been allegations of wrongdoing by corporate executives?
- ☐ Yes ☐ No
- If yes, please describe:
67. Have you or anyone close to you been a party to any shareholder action or lawsuit against a corporation or a corporation's executives?
- ☐ Yes ☐ No
- If yes, please describe:
68. Have you or anyone close to you ever served on, worked for or appeared before an Audit Committee of any corporation, company, charitable organization or other entity?
- ☐ Yes ☐ No
- If Yes, briefly describe your responsibilities and type/size of the organization:
69. Have you ever worked with auditors or conducted an audit of any corporation, company, charitable organization or other entity?
- ☐ Yes ☐ No
- If yes, please describe:

STATEMENT

70. Have you ever been a member of any shareholder's rights group or executive compensation reform group?
- ☐ Yes ☐ No
- If yes, please describe:
71. Did you follow any of the lawsuits/prosecutions in the past few years involving WorldCom, Global Crossing, Qwest Communications, Enron, Arthur Andersen, Adelphia or Tyco?
- If yes, how closely?
72. Have you ever owned stock in a company whose officers or the corporation itself have been charged with a crime?
- If yes, please describe:
73. Under the United States Constitution, a person or entity accused of a crime does not have to testify in his defense or present any witnesses and his/its silence may not be used against him/it. Can you abide by this constitutional requirement?
- ☐ Yes ☐ No

STATEMENT

74. Is there any matter not covered by this questionnaire that you think the attorneys or the Court might want to know about you when considering you as a juror in this case?

☐ Yes ☐ No

If yes, please describe:

75. Do you have personal, religious, philosophical or other beliefs that would make it difficult for you to sit in judgment of another?

☐ Yes ☐ No

If yes, please explain

76. Is there any matter you would prefer to discuss privately?

☐ Yes ☐ No

77. Do you have difficulty reading, speaking or understanding the English language?

☐ Yes ☐ No

If Yes, please explain:

78. Is there anything else about your ability to serve as a juror that you think we should know?

☐ Yes ☐ No

If yes, please explain:

STATEMENT

STATEMENT

JUROR'S OATH

I declare under penalty of perjury that the answers set forth in this Jury Questionnaire are true and correct to the best of my knowledge and belief. I have not discussed my answers with others, or received assistance in completing the questionnaire.

Signature

Print Name

Date

STATEMENT

Please use the space below to finish any of your answers. Please specify the number of any questions to which you are completing an answer.
